



**PUBLIC
INTEREST
DISCLOSURE
SCHEME**

CHAPTER 3: Agency obligations

- 3.1 Why public interest disclosures are important**
- 3.2 Principal officer responsibilities**
- 3.3 Other key PID roles and responsibilities**

AGENCY GUIDE TO THE *PUBLIC INTEREST DISCLOSURE ACT 2013*

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3 Agency obligations

3.1 Why public interest disclosures are important

3.2 Principal officer responsibilities

3.3 Other key PID roles and responsibilities

3.1 WHY PUBLIC INTEREST DISCLOSURES ARE IMPORTANT

The objects of the *Public Interest Disclosure Act 2013* (PID Act) include encouraging and facilitating the making of public interest disclosures by public officials, and former public officials (s 6(b)). Making a public interest disclosure accords with the ethical culture of the Commonwealth public sector, including the employee's duty to act with integrity in the course of Australian Public Service and Parliamentary Service employment (s 13 of the *Public Service Act 1999*; s 13 *Parliamentary Service Act 1999*).

Employees and contractors have a close-up perspective on what happens in the workplace. Those who are prepared to report wrongdoing can be important and reliable sources of information to identify problems which should be addressed, including unethical practices. However, many employees and contractors are reticent to report wrongdoing, or to do so in a timely way. Barriers to disclosing might include uncertainty about the seriousness of the problem, unwillingness to 'rock the boat', wishing to avoid conflict and protect career prospects, and fear of reprisal, coupled with doubt that the agency will provide adequate protection and/or properly investigate the disclosure.

An effective public interest disclosure scheme has many benefits to agencies and the broader Commonwealth public sector. Properly managed, the public interest disclosure scheme enhances an agency's capacity to:

- » identify, as early as possible, conduct that needs correction
- » detect any weak or flawed systems which may make the agency vulnerable
- » manage disclosed information appropriately and address problems before they escalate
- » avoid inefficiency and financial loss
- » reduce risks to the environment, or the health or safety of staff or the community
- » prevent damage to the agency's reputation and standing, and that of the Australian Government
- » support a coherent and comprehensive integrity system, and cultivate a culture of integrity in the Australian Public Service
- » facilitate public trust in government.

The PID Act, PID Standard and agency procedures can only go part of the way to creating an effective public interest disclosure scheme. An essential part of a successful scheme is agencies being committed to a culture that encourages the reporting of wrongdoing, ensures timely action on disclosures, delivers appropriate training and supports for public officials, and protects disclosers and witnesses from any adverse consequences.

Strong agency commitment to the public interest disclosure scheme requires:

- » policies and procedures that demonstrate the agency's endorsement of reporting suspected wrongdoing and protecting disclosers
- » endorsement by senior management of the principles in the PID Act
- » commitment by supervisors and line managers, given that they will often be the first point of contact for disclosers and have immediate responsibility for staff welfare
- » trust by public officials that agency procedures are sound, and that the agency will ensure that disclosures

are acted on and disclosers are protected from reprisal.¹

3.2 PRINCIPAL OFFICER RESPONSIBILITIES

The principal officer of each agency has a range of obligations under the PID Act aimed at ensuring public officials who belong to that agency are aware they can make a disclosure, authorised officers are accessible, and the agency deals appropriately with every disclosure made.

The principal officer is the agency head – that is, the departmental secretary, chief executive officer, or head of agency (however described), including an individual prescribed under the PID rules (see the full definition in s 73).²

A principal officer's specific responsibilities under the PID Act include:

- » appointing authorised officers (s 36), and ensuring the number of authorised officers of the agency is sufficient to be readily accessible by public officials belonging to the agency and public officials are aware of the identity of each authorised officer within the agency (s 59(1))
- » encouraging and supporting public officials who make, or are considering making a disclosure, as well as to those who may assist with such disclosures (s 59(2))
- » establishing written procedures for facilitating and dealing with public interest disclosures relating to their agency (s 59(3)) – these procedures must deal with assessing risks that reprisals may be taken in relation to disclosures, provide for confidentiality of investigative processes, and comply with any standards in force under s 74(1) (s 59(4))
- » ensuring that disclosures are properly investigated (ss 47, 52 and 53), including preparing an investigation report (s 51) and taking appropriate action in response to the report (s 59(6))
- » providing ongoing training and education on the PID Act to all public officials belonging to an agency (s 59(7)) and ensuring that those appointed to a position that may require them to discharge functions or duties under the PID Act are given training and education appropriate for the position within a reasonable time (s 59(8))
- » taking reasonable steps to protect public officials who belong to the agency against detriment and reprisals that have been, or may be, taken in relation to a public interest disclosure that has been made, could be made, or proposed to be made to an authorised officer or supervisor within the agency (s 59(9))
- » notifying the discloser and the Ombudsman or the IGIS (as appropriate) at various stages in handling a disclosure (ss 44, 44A, 44B, 45A, 50, 50A, 51(4))
- » providing information and assistance to the Ombudsman and the IGIS, including in relation to the preparation of reports to Parliament on the operation of the PID Act (s 76(3)).

Each of these responsibilities is discussed in more detail in this guide. The principal officer can delegate any or all of those functions or powers to a public official who belongs to the agency (s 77).

The principal officer of an agency is also an 'authorised officer' of that agency, meaning they can receive disclosures about the agency, or from the public officials who belong to the agency.

Most disclosures are likely to be made to the other authorised officers appointed by the principal officer (see 2.7.1.1 of this guide), or via a public official's supervisor (see 2.7.1.2). However, the principal officer remains an 'authorised officer' even after they appoint other authorised officers in the agency.

3.2.1 Appointing authorised officers and ensuring that officials can contact them

An authorised officer is a public official who belongs to the agency and is either the principal officer or is appointed in writing as an authorised officer by the principal officer (s 36).

The principal officer must ensure there is a sufficient number of authorised officers to be readily accessible to public officials who belong to the agency (s 59(1)). This includes former public officials and staff of contracted service providers (s 69).

¹ P Roberts, A J Brown & J Olsen, *Whistling while they work*, 2011, ANU E Press, p. 18.

² The principal officer may be different from the accountable authority under *Public Governance, Performance and Accountability Act 2013* and the head of agency under the *National Anti-Corruption Commission Act 2022*.

Authorised officers require good judgement and should be skilled in dealing with sensitive matters. Importantly, the principal officer must take reasonable steps to ensure that an authorised officer belonging to the agency is given training and education appropriate for the position within a reasonable time of assuming that position (s 59(8)). Authorised officers must be familiar with the provisions of the PID Act so they can provide advice to disclosers and potential disclosers about the process and the protections available to them (s 60).

To maintain the separation of allocation and investigative processes, officials who are appointed as authorised officers generally should not also be delegates of the principal officer. However, if this is not feasible due to an agency's size, it is best practice that an investigation is not undertaken by the same authorised officer that received and allocated the disclosure.

Authorised officers are not required to be the most senior officers in an agency. Rather, it is preferable to establish a network of authorised officers that are appointed across various levels (i.e., APS, EL, SES), and located in different work areas and, where applicable, geographic locations within an agency to ensure that they are accessible to all staff in the agency.

There is a risk that requiring disclosures to be made to a particular area or officer may discourage certain staff to be forthcoming or may raise a conflict of interest. In deciding how many authorised officers to appoint, and who they should be, the principal officer should consider factors such as:

- » the size of the agency
- » the profile and seniority of the officials who belong to the agency
- » the nature of the work performed in the agency
- » areas with higher risk and opportunity for 'disclosable conduct' such as fraud
- » the geographical location of staff (and their supervisors and managers).

The principal officer must ensure public officials who belong to the agency are aware of the identity of each authorised officer in the agency (s 59(1)). Section 5 of the PID Standard states that principal officers must ensure their agency provides an effective means for potential disclosers to find out how to contact authorised officers.

The contact details of authorised officers should be easy to find, for example, on the agency's intranet or in staff bulletins. Given that public interest disclosures may be made by former public officials or officials in other agencies, details for contacting authorised officers should also be available on each agency's website.

Provided there are also avenues for making disclosures by telephone or in person, it is open to an agency to set up an online system for receiving written disclosures, such as through a web-based form, or to use a generic email address such as 'pid@agencyname.gov.au'. However, it is important to restrict access to disclosures received through these channels, so that only people legitimately performing a function under the PID Act can become aware of the disclosed information (noting that only an authorised officer can receive and allocate an internal disclosure³).

3.2.2 Establishing agency PID procedures

The principal officer of each agency is responsible for establishing written procedures for facilitating and dealing with public interest disclosures relating to their agency (s 59(3)). Those procedures must, as a minimum, meet the requirements under the PID Act and PID Standard:

- » The PID Act requires that the procedures must deal with the assessment of risks that reprisals may be taken in relation to disclosures about the agency, provide for confidentiality of investigative processes, and comply with any standards in force under s 74(1) (s 59(4)).
- » The PID Standard establishes additional requirements for agency procedures relating to record keeping and notification in relation to allocating the handling of a disclosure, and support for public officials who make disclosures relating to the agency.

³ Although a supervisor may receive an internal disclosure from an official that they supervise, if the supervisor is not an authorised officer, their role in handling that disclosure is to give the information to an authorised officer of the agency as soon as reasonably practicable (s 60A(3), PID Act). A supervisor also has other obligations under the PID Act, including to explain to the discloser that the disclosure could be treated as an internal disclosure, that an internal disclosure would be given to an authorised officer, allocated and investigated under the PID Act, that it may be referred to another agency, person or body and that there are civil and criminal protections in relation to such disclosures (see 3.3.2 of this guide).

To minimise uncertainty within the agency, and to promote consistency in handling disclosures across the public sector, agency PID procedures should be comprehensive, clearly expressed and use terminology consistent with the PID Act and PID Standard.

Provided the legal requirements are met, agencies may develop their own policies and procedures to reflect their specific functions and responsibilities. Agencies may wish to specify in their PID procedures their preferred pathway for making a disclosure. For example, an agency's procedures might encourage officials to make disclosures about certain matters to an authorised officer in a particular area, or directly to an authorised officer rather than via a supervisor. However, an agency cannot prevent a person from making a disclosure anonymously or via another avenue, such as their manager or supervisor, or directly to the principal officer.

Each agency should carefully consider the target audience for its procedures. This includes current and former public officials, contracted service providers and their sub-contractors, as well as other people who might be 'deemed' public officials because they have information about suspected wrongdoing as a result of their close contact with agency officials (s 70 – see 4.1.2 of this guide). The agency's PID procedures should not only be available to those people, but also be appropriate to their situation.

Some agencies will choose to have an overarching policy document which sets out general principles –including the agency's commitment to public interest disclosures and expectations of staff – with a separate document containing more detailed procedures for receiving, managing and investigating public interest disclosures. Other agencies will prefer to include general policy and detailed procedures in a single document.

Whatever format is used, agency PID procedures should:

- » explain the legislative basis of the PID scheme and what it is about
- » state the agency's commitment to a culture that encourages reporting wrongdoing
- » define 'public official' as the term applies within that agency
- » explain how someone may be 'deemed' a public official so they can make a disclosure
- » identify the types of wrongdoing that can be reported
- » set out the protections available under the PID Act, for disclosers and others (e.g., witnesses and other officials) and the consequences at law (both criminal and civil) that apply to a person who takes reprisal action
- » outline the obligations of principal officers, authorised officers and supervisors under the PID Act
- » explain how reprisal risk will be assessed and when the risk assessment will be reviewed
- » explain the circumstances in which a public interest disclosure may be referred to an agency or body under another law of the Commonwealth, including under the *National Anti-Corruption Commission Act 2022* (NACC Act). This should, among other matters, cover:
 - the mandatory obligation under s 35 of the NACC Act for PID officers (including authorised officers and principal officers) to refer corruption issues to the NACC that they suspect raise serious or systemic corrupt conduct, and
 - that, where a referral has been made to the National Anti-Corruption Commission (NACC), an agency should continue to investigate the disclosure, unless a stop action direction under s 43(1) of the NACC Act is issued in relation to the disclosure (s 39 of the NACC Act)
- » outline confidentiality, anonymity, and secrecy considerations at all stages of an agency handling a public interest disclosure, as well as the role of authorised information sharing between agencies (see 8.1 of this guide)
- » provide for thorough documentation of all actions, conversations and decisions (including the reasons for decisions) relating to a disclosure
- » include the contact details for the agency's authorised officers (or provide links to that information in a form accessible for all current and former officials belonging to the agency)
- » provide advice for disclosers, including:

- advising disclosers to be clear and factual, and to avoid speculation, personal attacks and emotive language, which can divert attention from the real issues in their disclosure
 - stipulate that disclosers should not investigate a matter themselves before making a disclosure, as this may hinder a future investigation
 - inform disclosers that the sooner they raise their concerns, the easier it is likely to be for the agency to take action
- » outline the investigative process and notification requirements
 - » complement other relevant agency procedures, such as those relating to performance management, disciplinary action and investigation of fraud and corruption
 - » specify how the agency will manage its reporting obligations to the Ombudsman and the IGIS, including the requirement to provide the Ombudsman or the IGIS (as appropriate) with a copy of every investigation report
 - » include reference to the options of making a disclosure to the Ombudsman, the IGIS or prescribed investigative agencies
 - » set out the grounds under which external disclosures, emergency disclosures and legal practitioner disclosures may be made.

Agencies may wish to specify in their procedures that, depending on the circumstances, a discloser should think about covering as many of the following matters as possible in their disclosure so as to help the agency to determine how to proceed:

- » their name and contact details
- » the nature of the suspected wrongdoing
- » who they believe committed the suspected wrongdoing
- » when and where the suspected wrongdoing occurred
- » how they became aware of the suspected wrongdoing
- » whether the suspected wrongdoing has been reported to anyone else
- » if so, what that person has done to fix, stop or prevent it
- » whether they are concerned about possible reprisal as a result of making a disclosure.

3.2.3 Fostering agency culture

People are more likely to have confidence in the PID scheme and report wrongdoing if they trust that appropriate action will be taken, and they will be supported in raising their concerns and be protected from reprisals. The PID Act is designed to promote a pro-disclosure culture by ensuring there is a clear framework under which public officials can report wrongdoing and be protected and supported when doing so. Principal officers have a crucial role in fostering a pro-disclosure culture through their obligation to encourage and support public officials in their agency who make, or are considering making, a disclosure, as well as any other persons who provide assistance in relation to those public interest disclosures (s 59(2)). As part of this obligation, principal officers should ensure that agency managers at all levels fully support reporting of wrongdoing and are committed to ensuring appropriate action is taken in response.

Components of a pro-disclosure culture in an agency include:

- » policies and procedures which demonstrate the agency's endorsement of the reporting of wrongdoing and the protection of disclosers and other officials in the agency (including witnesses), covering both current and former officials of the agency
- » a clear statement of the agency's commitment to the highest standards of integrity and accountability, and support for officials who report wrongdoing – for greatest effect, this would be signed by the principal officer and placed at the start of the agency's policy or procedures on public interest disclosures

- » adequate resources (both human and financial) allocated to implement the PID policies and procedures
- » senior managers who endorse the principles of the PID Act and work to ensure that managers below them have a positive attitude to the reporting of wrongdoing and are aware of their responsibilities under the PID Act
- » managers and supervisors who believe that early identification of concerns within their team or work unit will assist them to resolve issues directly and avoid criticism for having failed to prevent problems in the first place, noting that managers may themselves be disclosers
- » line managers and supervisors who provide genuine support to disclosers and are empowered to effectively manage their workplace in the event of any conflict or threat of reprisal
- » specialist areas (such as human resources, internal audit and ethical standards units) that promote and advise people about the PID scheme and understand how it intersects with their work
- » proactive corporate governance systems which treat dealing with potential wrongdoing as part of the provision of a safer workplace, for example by taking reasonable steps to prevent and address inappropriate behaviour such as harassment and victimisation
- » staff who are aware of and support agency systems, policies and procedures relating to public interest disclosures.

Addressing these matters will also go some way to meeting a principal officer's obligation to support officials in their agency, and to protect them from reprisal action (ss 59(2) and 59(9)).

3.2.4 Staff awareness and training

Each agency should ensure that its staff and contracted service providers are aware of what a public interest disclosure is, what action to take if they suspect wrongdoing, how disclosures will be dealt with, and the protections that are available to them. Research has shown a strong relationship between an employees' belief they are covered by public interest disclosure legislation and their likelihood of reporting wrongdoing.⁴

The PID Act requires principal officers to encourage and support public officials who make a public interest disclosure, as well as those who are considering making a disclosure or providing assistance in relation to a disclosure. Principal officers must also provide public officials belonging to their agency with ongoing training and education about the PID Act, including on:

- » integrity and accountability
- » how to make a public interest disclosure
- » the protections available under the PID Act
- » the performance of functions under the PID Act by officials in the agency, and
- » the circumstances (if any) where a public interest disclosure must be referred under another law of the Commonwealth.

The principal officer must also take reasonable steps to ensure that public officials appointed to a position that may require them to perform functions under the PID Act are given training and education appropriate for the position, including for managers and supervisors. The training must be provided within a reasonable time of the person being appointed to that position. Additional or renewed training should be provided if a person's functions or duties under the PID Act evolve or change or where refresher training would be beneficial.

Agencies should consider the need to develop specialised training for different audiences amongst their staff:

- » Supervisors should receive ongoing training or education to recognise when a matter may be a public interest disclosure and what action to take. This includes ensuring staff are protected against reprisals and that supervisors can meet their obligation under the PID Act to provide assistance and explain certain matters to disclosers (see 3.3.2 of this guide). They should be aware of how their agency's various policies relate to each

⁴ Roberts, Brown & Olsen p. 28, citing P Roberts, 'Evaluating agency responses: the comprehensiveness and impact of whistleblowing procedures' in A J Brown (ed) Whistleblowing in the Australian public sector: enhancing the theory and practice of internal witness management in public sector organisations, 2008, ANU E Press, Canberra, pp. 237-243.

other, so that they can make judgements to inform the discloser about the appropriate course of action and explain relevant matters to them (for example, policies on bullying and harassment, workplace health and safety, Code of Conduct matters). This training should be recognised as part of general management competency requirements.

- » Authorised officers need ongoing training and education about their specific responsibilities under the PID Act, including making allocation decisions, notification requirements, conducting risk assessments and supporting disclosers. As part of their training on making allocation decisions, authorised officers should be provided with training and education about any related or available pathways that a public official in their agency may use to pursue an allegation of wrongdoing.
- » Investigators may need specialised training in conducting investigations, including investigation planning, procedural fairness requirements, interviewing witnesses, analysing evidence and report writing. It is up to each agency to ensure the necessary specialist skills are available. However, it is appropriate for agencies to have a number of different investigators available with a variety of skills and experience, who can be allocated matters to investigate according to their skills and experience.

It is also recommended that agencies provide training to staff in specialist areas (e.g., human resources, internal audit, fraud prevention and integrity hotlines) who need to understand how their subject matter interacts with the PID Act, how an official may use the PID Act, and their agency's PID processes to report suspected wrongdoing and receive protections for doing so.

Staff training and awareness activities that focus on the PID Act can also be a useful way to emphasise the positive aspects of a culture of disclosure. Agencies can explain that making a disclosure under the PID Act is one way for officials to report suspected wrongdoing. Agencies can advise officials of the other reporting mechanisms available and give officials the information they need to choose the best path.

Agency PID procedures must be readily accessible to all current and former public officials belonging to an agency. At a minimum, the procedures should be published on the agency's intranet page (for current employees) and on the agency's website for former employees and those who are providing goods or services to, or on behalf of the agency under a Commonwealth contract.

Publication of public interest disclosure procedures on the agency's website is consistent with the requirements of the Information Publication Scheme under the *Freedom of Information Act 1982* (FOI Act).

The Ombudsman's office has a range of information sheets and other guidance materials about the PID scheme on its website www.ombudsman.gov.au. Agencies can download the Ombudsman's PID scheme logo to brand PID information on their internal and external websites.

3.3 OTHER KEY PID ROLES AND RESPONSIBILITIES

All public officials have responsibilities in relation to public interest disclosures. Some responsibilities are listed in the PID Act, while others reflect good corporate governance and ethical behaviour.

Following is a discussion of the role and responsibilities of:

- » authorised officers (see 3.3.1)
- » managers and supervisors (see 3.3.2)
- » responsibilities of all public officials (see 3.3.3)

3.3.1 Authorised officer responsibilities

Authorised officers are officers of an agency authorised in writing by the principal officer for the purposes of the PID Act (s 36). Authorised officers are responsible for receiving and allocating disclosures under the PID Act, including carrying out the responsibilities that go along with these functions (see chapters 4 and 5 of this guide). It is *not* the role of an authorised officer to investigate a disclosure or determine the veracity of the allegations that make up a disclosure.

Authorised officers also have a range of other responsibilities under the PID Act, including:

- » explaining the requirements of the PID Act to an individual, in particular, informing them that a disclosure

- » could be treated as an internal disclosure, before making an allocation decision (ss 60(1)(c)) and 60(1)(d))
- » taking reasonable steps to protect public officials who belong to an agency against reprisals that have been, or may be, taken in relation to a public interest disclosure that has been made, may have been made, is proposed to be made or could be made to the officer (s 60(2)).
- » advising the individual about the circumstances (if any) in which a disclosure must be referred to an agency, or other person or body, under another law of the Commonwealth – including to the NACC (s 60(1)(da))
- » advising the individual of any designated publication restrictions⁵ that the authorised officer is aware apply to the information they have disclosed (s 60(1)(e)), and
- » deeming a person to be a public official to allow them to make a public interest disclosure (s 70).

Agencies may also wish to designate a particular authorised officer, or an officer in another area to:

- » be a contact point in the agency for general advice about the operation of the PID Act
- » liaise with the Ombudsman or the IGIS on related matters as required.

3.3.2 Manager and supervisor responsibilities

A public official may make a disclosure to their ‘supervisor’ (s 26). A supervisor includes any public official who supervises or manages the discloser (s 8), including the principal officer of an agency. It is recommended that each agency’s internal PID procedures clearly describe who is considered to be a supervisor or manager for which officials, by reference to the specific working arrangements and structure in that agency.

Supervisors play a key role in the public interest disclosure process. If a public official discloses information to their supervisor and the supervisor has reasonable grounds to believe the information concerns, or could concern, disclosable conduct, the supervisor must give that information to an authorised officer in the agency as soon as reasonably practicable (s 60A(3)). Under the PID Act, a supervisor must also ensure they explain the following matters to a discloser:

- » that their disclosure could be treated as an internal disclosure
- » the procedures under the PID Act for the disclosure to be given to an authorised officer, allocated to an agency and investigated by a principal officer of the agency to which the disclosure is allocated
- » the circumstances (if any) in which a disclosure must be referred to an agency, or other person or body, under another law of the Commonwealth, and
- » the civil and criminal protections the PID Act provides to protect disclosers and witnesses from reprisal action (s 60A(2)).

Managers and supervisors also have a key role in ensuring the workplace culture supports the making of public interest disclosures, and the individuals that make them. They can help to do so by:

- » having good general awareness of the PID Act and agency procedures, particularly in relation to what is ‘disclosable conduct’ and their obligation to inform an authorised officer
- » being careful to observe confidentiality requirements
- » knowing who the authorised officers are in their agency
- » being approachable to staff who wish to raise concerns
- » holding awareness sessions or discussion forums for their staff
- » ensuring all staff undergo available training and education
- » ensuring staff are aware of ways to submit an anonymous disclosure or by using a pseudonym

⁵ A ‘designated publication restriction’ means certain restrictions listed in the PID Act (s 8). They generally concern protecting the identity of people by such means as court or tribunal orders that information not be published (such as under the *Family Law Act 1975* and the *Migration Act 1958*), witness protection and law enforcement mechanisms (see the full definition in s 8).

- » confronting any workplace prejudices about making a disclosure
- » supporting a staff member who they know has made a public interest disclosure and ensuring they are protected from reprisal, and supported during an investigation
- » paying close attention to interactions in the workplace (for example, if workplace conflict occurs after a disclosure is made or while it is being investigated)
- » ensuring identified problems in the workplace are corrected
- » setting an example for staff through their own conduct and ethical approach.

3.3.3 Responsibilities of all public officials

Section 61 of the PID Act requires all public officials to use their ‘best endeavours’ to assist the principal officer in the conduct of an investigation, and to assist the Ombudsman or the IGIS in their functions under the PID Act. In addition, it also requires all public officials to use their best endeavours to assist any other public official to exercise a right, or perform a duty or function, under the PID Act. Importantly, persons assisting the principal officer of an agency or their delegate with their functions under the PID Act are immune from criminal and civil liability, and disciplinary action, for acts or omissions done in good faith when providing such assistance. Persons providing assistance in relation to a public interest disclosure (a witness) also receive immunity from criminal, civil and administrative liability for providing assistance in accordance with s 12A of the PID Act (see chapter 8 of this Guide).

In seeking to promote a pro-disclosure culture, public officials might also be expected to share general responsibility for ensuring the PID scheme works effectively by:

- » promoting awareness of PID scheme across all levels of staff (i.e., APS, EL, SES)
- » escalating to an appropriate person (a supervisor or authorised officer) any matters where there is evidence that shows or tends to show disclosable conduct
- » identifying areas where there may be opportunities for wrongdoing to occur because of inadequate systems or procedures, and proactively raising those with management
- » maintaining confidentiality whenever they are aware of the identity of a discloser, of anyone against whom an allegation has been made, or of anyone who has contributed to a disclosure investigation
- » providing assistance and support to staff in relation to a public interest disclosure
- » reporting to an appropriate person (a supervisor or authorised officer) any threats or reprisal action in relation to a disclosure.